



FREESTYLE CRUISING®

NCL (Bahamas) Ltd, Horatio House, 77-85 Fulham Palace Road, Hammersmith, London, W6 8JA

Tel. 020 8834 9000 Fax. 020 8834 9140 www.ncl.co.uk

## DATA PROTECTION ACT 1998

### UNDERTAKING

Data Controller: NCL (Bahamas) Ltd  
Horatio House  
77-85 Fulham Palace Road  
Hammersmith  
London  
W6 8JA

I, Stephen Park, General Manager of NCL (Bahamas) Ltd, for and on behalf of NCL (Bahamas) Ltd, hereby acknowledge the details set out below and undertake to comply with the terms of the following Undertaking:

1. NCL (Bahamas) Ltd is the data controller as defined in section 1(1) of the Data Protection Act 1998 (the "Act"), in respect of the processing of personal data carried out by NCL (Bahamas) Ltd and is referred to in this Undertaking as the "data controller". Section 4(4) of the Act provides that, subject to section 27(1) of the Act, it is the duty of a data controller to comply with the data protection principles in relation to all personal data in respect of which it is a data controller.
2. The Information Commissioner (the "Commissioner") received a report of the suspected theft of a computer printout containing payroll information relating to the data controller's UK employees. The incident occurred at the time of an office move which took place over the weekend of 26-27 September 2009. The printout contained names, addresses, dates of birth, National Insurance numbers, salary details and full bank account details for around 80 employees. The suspected theft was reported to the police, and there have been no reported cases of identity theft.
3. The data controller had a data protection policy in place, and was proactive in reporting the incident to the Commissioner and co-operating with his enquiries.
4. The Commissioner has considered the data controller's compliance with the provisions of the Act in the light of this matter. The relevant

NCL Reservations Tel. 0845 201 8900


provision of the Act is the Seventh Data Protection Principle. This Principle is set out in Schedule 1 Part I to the Act.


5. Following consideration of the remedial action that has been taken by the data controller, it is agreed that in consideration of the Commissioner not exercising his powers to serve an Enforcement Notice under section 40 of the Act, the data controller undertakes as follows:

**The data controller shall, as from the date of this Undertaking and for so long as similar standards are required by the Act or other successor legislation, ensure that personal data are processed in accordance with the Seventh Data Protection Principle in Part I of Schedule 1 to the Act, and in particular that:**

- (1) Physical security measures are at all times adequate to prevent unauthorised access to personal data;**
- (2) Staff are made aware of the data controller's policy for the storage and use of personal data and are appropriately trained how to follow that policy;**
- (3) Adequate provision is made for the secure transfer of personal data and procedures for this are communicated to all staff, including removal contractors, in advance of any future office move or reorganisation;**
- (4) The data controller shall implement such other security measures as it deems appropriate to ensure that personal data is protected against unauthorised and unlawful processing, accidental loss, destruction, and/or damage.**

Dated... 26TH APRIL 2010

Signed   
Stephen Park  
General Manager  
NCL (Bahamas) Ltd

Signed.....   
~~Mick Gorrill~~ David Smith  
Head of Enforcement Deputy Commissioner  
For and on behalf of the Information Commissioner